

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

DISABILITY RIGHTS MISSISSIPPI, LEAGUE  
OF WOMEN VOTERS OF MISSISSIPPI,  
WILLIAM EARL WHITLEY, MAMIE  
CUNNINGHAM, and YVONNE GUNN,

*Plaintiffs,*

v.

LYNN FITCH, in her official capacity as  
Attorney General of the State of Mississippi;  
MICHAEL D. WATSON, JR., in his official  
capacity as Secretary of State of Mississippi;  
GERALD A. MUMFORD, in his official capacity  
as Hinds County Attorney; and ELIZABETH  
AUSBERN, in her official capacity as Chickasaw  
County Attorney;

*Defendants.*

PLAINTIFF'S  
EXHIBIT

**5**

Civil Action No.

**DECLARATION OF MARGARET CIRALDO ON BEHALF OF THE LEAGUE OF  
WOMEN VOTERS OF MISSISSIPPI**

Pursuant to 28 U.S.C. § 1746, I, Margaret Ciraldo, declare as follows:

1. I am over the age of 18, and I am competent to make this declaration. I provide this declaration based upon my personal knowledge. I would testify to the facts in this declaration under oath if called upon to do so.
2. The League of Women Voters of Mississippi (“LWV-MS” or “the League”) is a plaintiff in the above captioned case.

3. I am the co-president of the LWV-MS. In my capacity as co-president of LWV-MS, I am familiar with—and receive frequent updates and proposals for—the activities of LWV-MS.
4. LWV-MS was founded in the 1920s and is a non-partisan, member-based, grassroots organization. Most of the League’s work is made possible by volunteers.
5. LWV-MS is the Mississippi affiliate of the League of Women Voters of the United States (“LWVUS”). LWV-MS is a nonprofit 501(c)(4) membership organization.
6. The LWV-MS is a nonpartisan civic organization that neither supports nor opposes any political party or candidate.
7. The mission of LWV-MS is to improve governance in Mississippi by engaging all Mississippians in the decisions that impact their lives. LWV-MS seeks to bring citizens into the civic process through community outreach and capacity building, voter registration and education, and community-oriented policy advocacy. LWV-MS believes that hands on work to safeguard democracy leads to civic improvement.
8. LWV-MS has five local Leagues: East-Central Mississippi (serving Meridian and Lauderdale County), Jackson-Area (serving Hinds, Madison, and Rankin Counties), Mississippi Gulf Coast (serving Hancock, Harrison, and Jackson Counties), Oxford-North Mississippi (serving Marshall, Union, Pontotoc, Calhoun, Yalobusha, Panola, Tate, Benton, Lee, and Desoto Counties), and Pine Belt (serving Hattiesburg and the surrounding area, Forrest, Jones, Covington, Pearl River, Jasper, Jefferson Davis, Marion, Smith, Simpson, Stone and Lamar Counties). Each local League is a member of the state League, and every local League member is a member of the state League.

9. LWV-MS has approximately 197 members, living in various communities across the state.  
At least one member has voted by mail.
10. LWV-MS regularly conducts voter service projects, including voter registration drives and other events. Local Leagues lead much of the LWV-MS's voter services work and local League members are essential to accomplishing voter services project goals.
11. We promote VOTE411.org, a national initiative of the League of Women Voters Education Fund ("LWVEF"). VOTE411.org is designed to provide all voters with the information they need to successfully participate in every election (local, state, and federal) because the League believes that laws and policies should reflect the values of the community. VOTE411.org also offers a Ballot Lookup Tool for voters to enter their addresses to find their local polling place and create a personalized voter guide to take with them on election day for in-person voting.
12. LWV-MS promotes VOTE411.org in Mississippi by providing digital resources on voter registration, voter ID, polling locations, and absentee voting. LWV-MS also compiles voter guides for local races and offers this information to Mississippians by sending questionnaires to candidates, making telephone calls, and conducting research through electronic platforms.
13. Part of this advocacy is making sure Mississippi voters are able to navigate the process for absentee voting. We do this by creating physical and online materials to educate our members and Mississippi voters. Because of the criminal penalties of S.B. 2358, we now have to create new materials to warn voters about this law. Because S.B. 2358 does not clearly define who is authorized to return ballots, we will also have to expend time and

resources to warn its member not to return any ballots at all—even if the member might be authorized—because of the high risk of imprisonment and reputational harm to LWV-MS.

14. We also have at least one member who, as far back as 2008, has assisted voters in jail with registering and voting by mail, including by helping individuals return their ballots. This member wants to continue to do this work and has reached out to a facility to inquire if the League can assist voters in jail by helping to complete and return their ballots. However, because of S.B. 2358, this member now fears they will be prosecuted if they assist a voter by returning their ballot.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed this <sup>30</sup>\_\_\_\_ day of May 2023

DocuSigned by:  
*Margaret Ciraldo*  
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Margaret Ciraldo